

2016R00258/LMC/SF

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA : Hon.
v. :
 : Crim. No. 22-
 :
 : 18 U.S.C. § 1958
SEAN CADDLE :
 :

INFORMATION

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

1. At all times relevant to this Information:

- A. Defendant SEAN CADDLE was a resident of New Jersey.
- B. There was a coconspirator ("CC-1"), who was a resident of Connecticut.
- C. There was a coconspirator ("CC-2"), who was a resident of Philadelphia, Pennsylvania and CC-1's associate.
- D. The Victim was a resident of Jersey City, New Jersey.

THE MURDER FOR HIRE CONSPIRACY

2. From in or about April 2014 through on or about May 23, 2014, in Hudson County, in the District of New Jersey and elsewhere, defendant

SEAN CADDLE

knowingly and intentionally conspired and agreed with CC-1 and CC-2 to travel in, and cause another to travel in, interstate commerce, that is, from Connecticut and

Pennsylvania to New Jersey, and to use, and cause another to use, facilities of interstate commerce, with intent that a murder be committed, in violation of the laws of the State of New Jersey, specifically, N.J.S.A. § 2C:11-3, as consideration for the receipt of and as consideration for a promise and agreement to pay a thing of pecuniary value, that is, United States currency, resulting in the death of the Victim.

Object of the Conspiracy

3. The object of the conspiracy was for CADDLE to pay CC-1 and CC-2 thousands of dollars in cash in consideration for murdering the Victim.

Manner and Means

4. The manner and means by which CADDLE, CC-1, and CC-2 sought to accomplish the object of the conspiracy included, among other things, the following:

a. In or about April 2014, while in New Jersey, CADDLE solicited CC-1 to commit a murder in exchange for cash.

b. CC-1 recruited CC-2 to commit the murder-for-hire following an interstate telephone call and in-person meeting between them.

c. CC-1 informed CADDLE that CC-1 and CC-2 were willing to commit the murder-for-hire. CADDLE advised CC-1 that the Victim was the target and paid CC-1 several thousand dollars in cash up front.

d. On or about May 22, 2014, CC-1 and CC-2 traveled from Connecticut and Pennsylvania, respectively, to New Jersey for the purpose of murdering the Victim.

e. On or about May 22, 2014, CC-1 and CC-2 went to the Victim's apartment in Jersey City. After entering the apartment, CC-1 and CC-2 stabbed the Victim to death. CC-1 and CC-2 then set fire to the Victim's apartment.

f. On or about May 23, 2014, in Elizabeth, New Jersey, CADDLE met with CC-1 and paid CC-1 thousands of dollars in cash as consideration for the murder of the Victim. CC-1 shared that money with CC-2.

In violation of Title 18, United States Code, Section 1958.

A handwritten signature in blue ink that reads "Philip R. Sellinger". The signature is cursive and fluid, with "Philip" and "R." being more formal and "Sellinger" being more cursive.

PHILIP R. SELLINGER
UNITED STATES ATTORNEY

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INFORMATION FOR

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